EXHIBIT E

Declaration of Heidi Machock

- I, Heidi Machock, hereby declare the following to be true and correct:
- 1. I am over the age of 18 and have personal knowledge of the facts stated in this declaration.
 - 2. I am a Director for PayPal, Inc., with its headquarters in San Jose, California.
 - 3. I also reside in California.
- 4. In my capacity as a Director for PayPal, I participated in a telephone conversation with Tim Fruge, Plaintiff's representative, on September 20, 2018, along with two of my colleagues at PayPal: a Relationship Manager, and a Director of Customer Support.
- 5. We were speaking with Mr. Fruge to inform him of PayPal's decision to terminate the following accounts: Prison Planet, InfoWars Store, Infowars-Donation, Infowars Ebay Shop, Infowars Shop, and Infowars Ads.
- 6. Neither Mr. Fruge nor anyone else asked for permission to record the conversation.
- 7. We informed Mr. Fruge that PayPal was giving him ten business days to transition to other payment processors.
 - 8. We offered our assistance if he needed it to help with the transition.
- 9. After we finished the call, Mr. Fruge never contacted me to request assistance or ask for additional time to make the transition.
- 10. Instead, the secretly recorded conversation was posted on the Infowars website without my consent at the following URL: https://www.infowars.com/shock-audio-listen-to-the-phone-call-where-paypal-banned-infowars/

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11. I never consented to the recording of our conversation and was unaware that the conversation had been recorded until I learned that it had been posted on the Internet, by or on behalf of this Plaintiff.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: October 3, 2018

Heidi Machock